UI Integrity Action Plan (IAP)

State	Federal Fiscal Year	Accountable Agency Official(s):

State	Federal Fiscal Year	Accountable Agency Official(s):
Tennessee	2019	Commissioner Burns Phillips III, Deputy Commissioner Dustin Swayne, Employment Security Assistant Commissioner Rusty Felts, Assistant Administrator Jason Cecil, Assistant

	Top Three Root Causes (Calendar Year 2017) https://www.dol.gov/general/maps/data	Calendar Year 2016 (% of $ Overpaid)	Calendar Year 2017 (% of $ Overpaid)
Root Cause #1:	Benefit Year Earnings	12.99%	63.80%
Root Cause #2:	ES Registration	18.81%	14.38%
Root Cause #3:	Separation Issues	47.21%	8.28%

State	Federal Fiscal Year	Accountable Agency Official(s):
Tennessee	2020	Commissioner Jeff McCord, Deputy Commissioner Steve Hawkins, Employment Security Assistant Commissioner Rusty Felts, Assistant Administrator Jason Cecil, Director of Claim

	Top Three Root Causes (Calendar Year 2018) https://www.dol.gov/general/maps/data	Calendar Year 2017 (% of $ Overpaid)	Calendar Year 2018 (% of $ Overpaid)
Root Cause Alternate Year #1:	Work Search	32.28%	31.63%
Root Cause Alternate Year #2:	Benefit Year Earnings	31.53%	31.16%
Root Cause Alternate Year #3:	Separation Issues	25.61%	25.96%

Summary: (Provide a summary of the plan that the state has designed. The summary should include outreach efforts planned by the agency to inform all UI and workforce staff, and employers of the strategic plan to ensure everyone understands the importance of maintaining program integrity.)

Tennessee has developed a UI Integrity Strategic Plan for FY 2019-2020 that includes the following strategies;

1. Tennessee implemented the Training, Research and Compliance Unit (TRAC) in April of 2017. This Unit is continuing to develop system wide training for the Unemployment Division.

o The TRAC Unit will ensure that the Division is receiving proper training including detection of improper payments. This Unit will ensure the Division is compliant with State and USDOL policy and procedures. The TRAC Unit will prepare refresher training for Claim Operations personnel to include topics on how to identify and document overpayments and educating claimants on reporting wages and separations.

o A need has been identified to provide consistent instructions and messaging to claimants to ensure wages and separations are reported properly during the claimants' benefit year. Periodically onsite training or webinar will be conducted for claim center personnel; training documents will also be created and provided to claim center personnel.

Instructions for the following section: In each individual section below, enter a Root Cause, from above, and the top three focused Strategies that will be employed to correct or reduce this cause of overpayments. An additional line is available in each section to include other significant strategies that target the root cause.

Root Cause #1: Benefit Year Earnings

Strategies	Actions	Targets & Milestones	Resources
1. Develop continued training strategies from the TRAC unit. Unit 2. Utilize state and national directory of new hire to detect 3. Improve Certification process. TN will be working with GSI to improve	Continuing to develop training for all UI staff concentrating on detecting correct issues Continual improvement of operating procedures for BPC processes. Agency and GSI will work to improve certification process beginning with design process over the third and fourth quarter 2018. This will improve root	Continuous Continuous Implementation by June 2019	TRAC team BPC staff, and management Geographic Solutions and TN Dept. of Labor UI
Additional: Claimants are required to acknowledge benefits rights prior to Utilize online training for claims agents and adjudication from	Continue to present acknowledgments at time of certifications Use NASWA Integrity Center online training for UI staff during 2019.	Continuous Complete this by December	GSI claims system certification process UI claims staff, NASWA Integrity center

Root Cause #2: ES Registration

Strategies	Actions	Targets & Milestones	Resources
1 Improve Certification process. TN will be working with GSI to improve 2 Utilize state and national directory of new hire to detect 3 Continued training by TRAC unit for claims staff. This training will	Agency and GSI will work to improve certification process beginning with design proce Continual improvement of operating procedures for BPC processes. Continuing to develop training for all UI staff concentrating on detecting correct issues	Implementation by June 2019 Continuous Continuous	Geographic Solutions and TN Dept. of Labor UI BPC staff, and management TRAC team
Additional: Monitor BAM paid cases to determine trends in improper	BAM Manager will submit monthly report to Director UI Integrity. This will then be examined by Integrity Task force for improvement.	Continuous	BAM Manager, Integrity Director, Task Force

Root Cause #3: Separation Issues

Strategies	Actions	Targets and Milestones	Resources
1. Continue use of automatic denial when claimant fails to meet the 2 Continue use of GUS claims system. Continue to display check Eligibility Review Process Continue eligibility review process each week	Automatically deny claim if work search is not adequate meaning claimant did not provide three work searches or did not have reportable service. They Currently Implemented ask ERI questions each week during certification process.	Continuous Continuous Continuous	GUS claims system, Claims Operations GUS claims system, UI Staff GUS claims system, UI Staff
Additional: Improve Certification process. TN will be working with GSI to improve	Agency and GSI will work to improve certification process beginning with design process over the third and fourth quarter 2018. This will improve root	Jun-19	TN UI staff, Geographic Solutions

Root Cause Alternate Year #1: Work Search

Strategies	Actions	Targets & Milestones	Resources
1 Work with GSI to present jobs to claimant when certification is 2 Continue to require entry of the work search electronically during 3. Continue use of automatic denial when claimant fails to meet the Additional: Monitor BAM paid cases to determine trends in improper	Develop process of presenting jobs to claimant when they complete certification. This will be based on occupation codes. This will enhance Claimants will need to enter three work searches prior to completion of certification. If claimant does not complete this claim will be denied for Automatically deny claim if work search is not adequate meaning claimant did not provide three work searches or did not have reportable service. They **BAM Manager will submit monthly report to Director UI Integrity. This will then be examined by Integrity Task force for improvement.**	Implementation June 30 2020. Continuous Continuous Continuous	GSI staff TN UI Staff GUS claims system GUS claims system **BAM Manager, Integrity Director, Task Force**

Root Cause Alternate Year #2: Benefit Year Earnings

Strategies	Actions	Targets & Milestones	Resources
1.Work with GSI to improve certification process when 2. Utilize state and national directory of new hire to detect 3.Claimants are required to acknowledge benefits rights prior Additional: Improve verbiage in acknowledgment area on reporting	Develop a simplified certification process for claimants to report earnings. Have them enter the earning at the time they answer yes to "have you worked Continual improvement of operating procedures for BPC processes. Continue to present acknowledgments at time of certifications and add wording to include reporting separations. Acknowledgment will be required Examine acknowledgement areas and improve verbiage for better understanding on how to report earnings.	Implement by 3/31/2020 Continuous Implementation by December 2019 Continuous	GSI, Tenn. claims/Integrity staff BPC staff, and management Geographic Solutions and TN Dept. of Labor UI GSI claims system certification process

Complete this by December

UI claims staff, NASWA Integrity center

Root Cause Alternate Year #3: Separation Issues

Strategies	Actions	Targets and Milestones	Resources
1. Develop continued training strategies from the TRAC unit. Unit 2. Utilize state and national directory of new hire to detect 3.Claimants are required to acknowledge benefits rights prior Additional: Monitor BAM paid cases to determine trends in improper	Continuing to develop training for all UI staff concentrating on detecting correct issues **Currently Implemented. Also address programing and adapt to recordation's in UIPL 13-19** Continue to present acknowledgments at time of certifications and add wording to include reporting separations. Acknowledgement will be required **BAM Manager will submit monthly report to Director UI Integrity. This will then be examined by Integrity Task force for improvement.**	Continuous 3/31/2020 **Continuous** **Continuous**	GUS claims system, Claims Operations **GUS claims system, UI Staff** **GUS claims system, UI Staff** **BAM Manager, Integrity Director, Task Force**